

April 28 2017

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*,  
GN Docket No. 14-177; IB Docket Nos. 15-256, 97-95; RM-11664; and WT Docket  
No. 10-112.

Dear Ms. Dortch:

On April 26, 2017, Maureen C. McLaughlin, Vice President of Public Policy for Iridium Communications, Inc. (“Iridium”), V. Shiva Goel of Harris, Wiltshire & Grannis LLP and I met with Daudeline Meme of Commissioner Clyburn’s office, and separately with Erin McGrath of Commissioner O’Rielly’s office.

We discussed pending petitions for reconsideration of the Commission’s Spectrum Frontiers Report and Order.<sup>1</sup> In particular, we argued that any decision authorizing terrestrial mobile services in the 29.1-29.25 GHz band would be both unlawful and unwise.

First, we argued that authorizing terrestrial mobile services in the 29.1-29.25 GHz band on reconsideration would be procedurally impermissible under the Commission’s rules and the Administrative Procedure Act.

Second, we explained that Iridium’s co-primary operations distinguish the 29.1-29.25 GHz band from other spectrum identified for terrestrial mobile services by the Commission, and that the challenges of preventing harmful interference into both Iridium’s network and terrestrial mobile networks would be substantial in the event of co-frequency operations.

Third, we suggested that even assuming co-existence were possible, the 29.1-29.25 GHz band is too small and too isolated to be of much value to terrestrial mobile operators. Indeed, the only terrestrial mobile use case proposed for the band – one-way, unpaired supplemental downlink operations – would be hopelessly inefficient and incapable of promoting wireless competition (even assuming it were technologically possible).

Finally, we explained the availability of *fixed* equipment manufactured for the *European* market is irrelevant to the question of whether the Commission should authorize terrestrial mobile services in

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<sup>1</sup> *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Report and Order and Further Notice of Proposed Rulemaking, FCC 15-138, 31 FCC Rcd. 8014 (2016).

the 29.1-29.25 GHz band in the United States. In any event, Europe has generally rejected terrestrial mobile operations in the 29.1-29.25 GHz band.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is stylized, with the first letter of "SCOTT" being a large, bold "S" and the last letter of "HARRIS" being a capital "S".

Scott Blake Harris  
*Counsel to Iridium Communications, Inc.*

cc: Daudeline Meme  
Erin McGrath